

MEMO ENDORSED

CHARTWELL LAW

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January 2, 2024

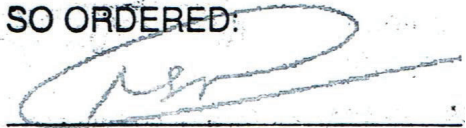
Via ECF

District Court Judge Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

In light of the extension of the discovery deadline, the parties' joint request to adjourn the Status Teleconf. from Feb. 14, 2024 until Mar. 27, 2024 at 10:00 am is GRANTED. Counsel are directed to this Court's Order at ECF No. 8 for dial-in instructions. Clerk of Court is requested to terminate the motion at ECF No. 32. Dated: White Plains, NY January 12, 2024

Re: *Laura Pellegrino v. BJ's Wholesale Club, Inc.*
Docket No.: 7:22-cv-4805 (NSR) (VR)
Our File No: 8282.0088393

SO ORDERED:

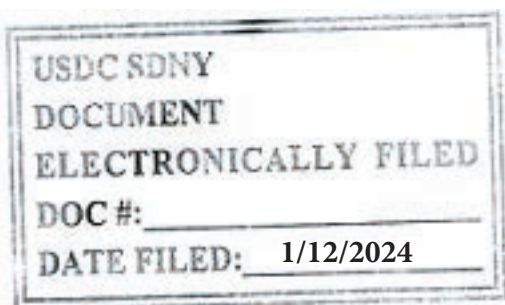

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Honorable Sir:

We represent defendant BJ's Wholesale Club, Inc. ("BJ's") in the above-referenced matter.

Pursuant to the enclosed order, Magistrate Judge Victoria Reznik has extended the discovery deadline until March 7, 2024, and directed the parties to make an application to your Honor for an adjournment of the February 14, 2024 telephonic conference.

Accordingly, the parties jointly request an adjournment of the February 14, 2024 conference due to the fact that the discovery deadline has been extended until March 7, 2024.



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Thank you for your time and consideration.

CHARTWELL LAW

By: *Jarett L. Warner*
Jarett L. Warner

cc: FV Kelly, Esq. (*via ECF*)

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December 29, 2023

Via ECF

Magistrate Judge Victoria Reznik
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *Laura Pellegrino v. BJ's Wholesale Club, Inc.*
Docket No.: 7:22-cv-4805 (VR)
Our File No: 8282.0088393

Dear Magistrate Judge Reznik:

We represent defendant BJ's Wholesale Club, Inc. ("BJ's") in the above-referenced matter. Pursuant to the Court's directives, please allow this correspondence to serve as the parties' joint status letter.

Discovery in this matter has progressed in the last month. Plaintiffs' counsel has provided the outstanding written discovery and BJ's has processed the additional medical authorizations provided, and is following up with the additional medical providers for the pertinent records. The parties completed the deposition of BJ's representative, Delores Fletcher, on December 11, 2023. The orthopedic examination of plaintiff was conducted on December 22, 2023 and we await the orthopedic examination report. The parties have also scheduled the continued deposition of plaintiff on the damages portion of her case for January 11, 2024. We anticipate that we may serve some post-deposition discovery requests following the deposition.

We anticipate disclosure of the orthopedic expert report as well as a weather expert and possibly a radiological expert in the next couple of weeks. We would also like to depose plaintiff's orthopedic surgeon, Dr. Steven Zelicoff.

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Currently, all discovery is to be completed by January 22, 2024 pursuant to the Court's September 13, 2023 Scheduling Order. As the parties have made significant progress on discovery in the last month and are near completion of discovery, however, it appears that some final limited discovery will be ongoing at that time, the parties hereby request one final forty-five day extension for the completion of all discovery.

Thank you for your time and consideration.

CHARTWELL LAW

By: Jarett L. Warner
Jarett L. Warner

cc: FV Kelly, Esq. (via ECF)

The parties' request for a 45-day extension of discovery is **GRANTED**. All discovery shall be completed by **March 7, 2024**. There will be **no further extensions** absent good cause.

To accommodate this extension, the parties are directed to write to Judge Román, requesting an adjournment of the Case Management Conference, currently scheduled for February 14, 2024.

The parties are further directed to submit another joint letter, by no later than **January 26, 2024**, providing the Court with an update on the status of the case. The letter should detail the progress of discovery in the prior month and the anticipated next steps in the upcoming month.

Dated: January 2, 2024

APPLICATION GRANTED

Victoria Reznik
Hon. Victoria Reznik, U.S.M.J.